

# EXHIBIT B

**INDEX TO TEVA DEFENDANTS' MOTION TO SEAL EXHIBITS TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION OF CONSUMER ECONOMIC LOSS CLAIMS (Dkt. 1748)**  
**PURSUANT TO LOCAL CIVIL RULE 5.3(c)**

	<b>Material</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief Is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought Is Not Available</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
1.	TEVA-MDL2875-00049024 (attached as <b>Exs. 16 and 67</b> to Dkt. <a href="#">1748</a> )	This document is an internal investigation report that provides information about the Teva Defendants' internal reporting and investigative processes, as well as competitively sensitive comments on their evaluation of a supplier.	This Exhibit if unsealed would provide competitors with direct insight into the Teva Defendants' internal reporting, investigative processes, and business strategies.	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy interests in maintaining the contents of this Exhibit under seal, as there are no redactions that can be made to protect the confidentiality of the contents of the document.	Plaintiffs object to maintaining this document under seal as they contend there is no non-public, commercially sensitive proprietary information contained in the document that would require sealing.
2.	TEVA-MDL2875-00549883 (attached as <b>Ex. 66</b> to Dkt. <a href="#">1748</a> )	This document is an internal investigation report that provides information about the Teva Defendants' internal reporting and investigative processes, as well as competitively sensitive comments on their evaluation of a supplier.	This Exhibit if unsealed would provide competitors with direct insight into the Teva Defendants' internal reporting, investigative processes, and business strategies.	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy interests in maintaining the contents of this Exhibit under seal, as there are no redactions that can be made to protect the confidentiality of the contents of the document.	Plaintiffs object to maintaining this document under seal as they contend there is no non-public, commercially sensitive proprietary information contained in the document that would require sealing.

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3.	TEVA-MDL2875-00020519 (attached as <b>Ex. 72</b> to Dkt. <a href="#">1748</a> )	This document demonstrates the Teva Defendants' internal toxicology assessment and risk assessment processes, as well as competitively sensitive comments on their evaluation of a supplier.	This Exhibit if unsealed would provide competitors with direct insight into the Teva Defendants' business strategies and internal processes for toxicology and risk assessment.	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy interests in maintaining the contents of this Exhibit under seal, as there are no redactions that can be made to protect the confidentiality of the contents of the document.	Plaintiffs object to maintaining this document under seal as they contend there is no commercially sensitive proprietary information contained within the document that would require sealing.
4.	TEVA-MDL2875-00522655 to TEVA-MDL2875-00522660 (attached as <b>Ex. 88</b> to Dkt. <a href="#">1748</a> )	This document discusses preparation of an audit report and provides information about the Teva Defendants' internal reporting and audit processes, as well as competitively sensitive comments on their evaluation of a supplier.	This Exhibit if unsealed would provide competitors with direct insight into the Teva Defendants' business strategies and internal reporting and audit processes.	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy interests in maintaining the contents of this Exhibit under seal, as there are no redactions that can be made to protect the confidentiality of the contents of the document.	Plaintiffs object to maintaining this document under seal as they contend there is no commercially sensitive proprietary information contained within the document that would require sealing.
5.	TEVA-MDL2875-00400391 to TEVA-MDL2875-0040000 (attached)	This document discusses preparation of an audit report and provides information about Teva's	This Exhibit contains non-public highly sensitive information that if unsealed would provide competitors	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy	Plaintiffs object to maintaining this document under seal as they contend there is no commercially

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	as <b>Ex. 90</b> to Dkt. <a href="#">1748</a> )	internal reporting and audit processes, as well as competitively sensitive comments on their evaluation of a supplier.	<p>of the Teva Defendants with direct insight into the thought processes of Teva's upper management and the decision-making process related to the undertaking of internal company audits.</p> <p>The Court previously addressed this Exhibit and noted that it should retain its confidentiality designation due to the details it contains related to questions asked by upper-level management at Teva that reveal their thought processes in undertaking the audits. <i>See</i> Sept. 13, 2021 Discovery Motion Hearing Transcript (Dkt. <a href="#">1561</a>) at 32.</p>	interests in maintaining the contents of this Exhibit under seal, as there are no redactions that can be made to protect the confidentiality of the contents of the document.	sensitive proprietary information contained within the document that would require sealing.
6.	TEVA-MDL2875-00042885 to TEVA-MDL2875-00042887 (attached as <b>Ex. 97</b> to Dkt. <a href="#">1748</a> )	This document discusses the internal processes put in place by the Teva Defendants for toxicology and risk assessment.	This Exhibit if unsealed would provide competitors with direct insight into the Teva Defendants' business strategies and internal processes for toxicology and risk assessment.	There is no less restrictive alternative available or practicable to protect the Teva Defendants' privacy interests in maintaining the contents of this Exhibit under seal, as there are no redactions	Plaintiffs object to maintaining this document under seal as they contend there is no commercially sensitive proprietary information contained within the document that would require sealing.

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				that can be made to protect the confidentiality of the contents of the document.	